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Attorneys for Defendants
UBER TECHNOLOGIES, INC., RASIER, LLC,
And RASIER-CA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF DANIEL
CUMMINGS IN SUPPORT OF
DEFENDANTS UBER TECHNOLOGIES,
INC., RASIER, LLC, RASIER-CA, LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PERSONAL
IDENTIFYING INFORMATION IN
EXHIBITS IN SUPPORT OF MOTION
FOR PARTIAL SUMMARY JUDGMENT**

This Document Relates to:

*Jaylynn Dean v. Uber Technologies,
Inc., et al., No. 3:23-cv-06708*

Judge: Hon. Charles R. Breyer
Courtroom: Courtroom 6 – 17th Floor

DECLARATION OF DANIEL CUMMINGS IN SUPPORT OF DEFENDANTS' ADMINISTRATIVE MOTION TO
FILE UNDER SEAL PERSONAL IDENTIFYING INFORMATION IN EXHIBITS IN SUPPORT OF MOTION FOR
PARTIAL SUMMARY JUDGMENT

Case No. 3:23-MD-3084-CRB

DECLARATION OF DANIEL CUMMINGS

I, Daniel Cummings having personal knowledge of the following state:

1. I am a partner at the law firm of Shook, Hardy & Bacon L.L.P., attorneys of record for Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC, (collectively, “Uber”). I am a member in good standing of the Bars of the States of Missouri, Kansas, and Nebraska. I know the following facts to be true of my own knowledge, except those matters stated to be based on information and belief, and if called to testify, I could competently do so. I offer this Declaration in the above-captioned matter in support of Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC’s Administrative Motion to File Under Seal Personal Identifying Information in Exhibits in Support of Motion for Partial Summary Judgment (“Motion to Seal”).

2. I have reviewed Defendants’ Motion for Partial Summary Judgment, filed November 10, 2025, and all exhibits and materials in support thereof, including Exhibits 22-34.

3. The limited portions of the exhibits in support of the Motion for Partial Summary Judgment, which Defendants seek to seal, contain personal identifying information (“PII”)—specifically, DOB (full and partial, month and date), partial SSN, driver’s license number (full and partial), email address, and phone number.

4. Exhibits 22-34 to Defendants’ Motion for Partial Summary Judgment are background check reports for the independent driver at issue in the Dean case from third-party background check provider Checkr. These background check reports contain PII, specifically DOB (full and partial, month and date), partial SSN, driver’s license number (full and partial), email address, and phone number.

5. Defendants seek to seal the above-described PII. They do not seek to seal the independent driver’s name or any other content in these exhibits.

6. Disclosure of the above-described PII would violate the independent driver’s legitimate privacy interests and would risk identity theft or other misuse by malicious actors.

